



# CALIFORNIA FARM BUREAU FEDERATION

EXECUTIVE OFFICES

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Via Email

May 4, 2006

Docket Clerk,  
Fruit and Vegetable Programs,  
AMS, USDA  
1400 Independence Ave., SW  
Stop 0243  
Washington, DC 20250-0243  
[scblockgrants@usda.gov](mailto:scblockgrants@usda.gov)

To Whom It May Concern:

The California Farm Bureau Federation (CFBF) is writing in response to the proposed regulations on the Specialty Crop Block Grant Program. As representatives of more than 34,000 farm families in the state that grow over 250 different commodities, we feel strongly that the specialty crop block grant program can be a tool to increase the productivity and competitiveness of US specialty crop producers.

In the proposed regulations it defines "specialty crops" as fruits and vegetables, tree nuts, dried fruits, and nursery crops (including floriculture). However, in the proposed rule under Sec. 1290.4 Eligible grant project - (a) "to be eligible for a grant, the project(s) must enhance the competitiveness of specialty crops. Priority will be given to fresh specialty crop projects." This clearly establishes a priority between fresh and non-fresh products, or processed products, when the intent of the grant program was to increase the competitiveness of all specialty crop producers. Those projects that research and promote processed products, such as wine, raisins, and other dried fruits, juice, sauces, canned and frozen products would not be considered equally with other proposed programs. Do nuts qualify as fresh product?

When the bill was debated in Congress, it started out as a "fresh produce" bill but was quickly expanded to include all specialty crops because it was recognized that there was a dried, frozen or further processed crop industry attached to all "fresh" commodities. Our producers sell their harvest both into the fresh and non-fresh marketplace. The non-fresh marketplace provides an alternate venue for products, and is sometimes the only outlet for those products that do not appeal to the fresh market consumer. For instance, culled oranges are sold for juice product. California harvests 281,000 acres, or 95% of the US's total processed tomatoes. We also harvest 37,000 acres of fresh tomatoes, which represents 30% of the US's total production. Processed tomatoes are not desirable for the fresh market but are sold to processors for tomato paste and sauce. Grapes picked from the vine can be sold as table grapes, raisins, and juice or wine grapes depending on supply, variety and quality.

Many processed products offer the same nutritious values as fresh products. These products can offer a balanced diet when a product's fresh season has ended.

It is our understanding that funding is only to support specialty crops grown in the US. We want to make sure that this is an accurate assumption and funding shall not be used to increase the competitiveness of non-US origin products.

We thank you for the opportunity to comment on the specialty crop block grant program. We feel strongly that the purpose of the program should be to increase the competitiveness of US specialty crop producers, whether the product is sold for the fresh or processed market. Therefore, we ask that the reference to fresh be removed from the proposed regulation.

CFBF looks forward to your response on this issue. Please do not hesitate to call Rayne Thompson at 916/561-5610 in my office with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Mosebar", with a stylized flourish at the end.

DOUG MOSEBAR  
President

cc: AG Kawamura, CDFA